

## REMARKS

Independent claims 1 and 14-16 all stand rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Applicants respectfully traverse this rejection. The Examiner has not reasonably interpreted the drawings of the present Application, and the proper standard of review under Section 112 has not been applied to the present claims.

With respect to the Examiner's remarks regarding Fig. 7 of the present Application, it appears that the Examiner is attempting to restrict the data bus lines 68A to being only those portions of the data bus lines between the switch units 66 and the signal lines 64. Nothing in Fig. 7 however, or its accompanying text, so unreasonably limits the interpretation of what constitutes a "data bus line" in the present Application. The Examiner's interpretation of Fig. 7 therefore, is without support from the present Application.

For the Examiner's interpretation to have any merit otherwise, the Examiner must have demonstrated that one of ordinary skill in the art would presume that a "data bus line" would constitute only that portion of the bus line outside of the boundaries of the display panel 16, and none of the portion of the lines that extend into the display panel, and its individual display elements. The proper standard of review was to determine what one of ordinary skill in the art would understand when interpreting the claims in light of the present Specification. One skilled in the art, however, is well apprised that data bus lines are commonly known to be the bus lines that actually extend into and through the display panel,

and even are capable of connecting to each individual display element in the panel. Accordingly, because all of the claim language cited by the Examiner is fully supported by the Specification, and is easily understood by one skilled in the art, this rejection must be withdrawn.

With respect to the Examiner's additional comments regarding the "new subject matter" from Amendment L (filed October 28, 2005), the independent claims have been amended herein to remove the language that the Examiner finds confusing, thereby broadening the claims. As previously explained, the amended language was substantively identical to the previous language, and differed only in grammatical form. The removal of the language herein though, renders this portion of the rejection moot.

Claims 1-6, 8-16, and 18-21 again stand rejected under 35 U.S.C. 102(b) as being anticipated by Nakajima (U.S. 5,654,735). Because this rejection is merely a repetition of the previous rejection, Applicants respectfully traverse the rejection again for at least the reasons of record. The Examiner has a burden under Section 707.07(f) of the MPEP to at least answer the meritorious arguments presented by Applicants traversing the rejection before repeating the rejection. In the present case, however, the Examiner has not done so. Accordingly, all of the arguments presented in Amendment L are incorporated by reference herein, and equally applicable to the independent claims as amended herein, as explained below.

In his "Response to Arguments," the Examiner improperly relies upon what he asserts to be "inherent" results of the structure described in the present Specification. It is

improper for the Examiner, however, to base an anticipation or obviousness rejection upon the teachings of the present Specification. The Examiner is required to review the claims according to what is shown by, or is an inherent result of, the prior art. Applicants specifically traverse the Examiner's assertion that the simultaneous transmission features of the present invention "appear to be little more than the inherent result of the signal lines...and the data bus lines...being connected to one another." Nothing in the cited portion of the present Specification (page 8, lines 7-33) describes that these claim features are an "inherent result." As previously discussed, one skilled in the art would easily understand by reading the claims in light of the present Specification that the structure and operation of the present invention is both novel and nonobvious over all of the cited prior art, and the Nakajima reference in particular.

Furthermore, even if the Examiner's assertions regarding "inherent results" were correct (which they are not), the Examiner still has not been able to establish a *prima facie* case of either anticipation or obviousness against the present invention. Anticipation and obviousness must be based upon the teachings and suggestions of the prior art, and may not be based on the teachings of the present Specification. Use of the present Specification in this way demonstrates an impermissible use of hindsight. For at least these reasons as well, the rejections must be withdrawn.

Additionally, the Examiner incorrectly asserts that "it could be said that Nakajima teaches 'two-way transmission' between those same signal lines and data bus lines." (Second full paragraph on page 11 of the outstanding Office Action, emphasis

added). Section 2143.01 of the MPEP, however, rejects this kind of reasoning. The mere fact that a prior art reference “could be said” to teach or suggest all of the features of the claimed invention is an insufficient basis upon which to establish either an anticipation or an obviousness rejection. Section 2143.01 requires that the prior art must actually teach or suggest the desirability of the claimed invention. Mere possibilities alone are insufficient, and the Examiner has only asserted the existence of such possibilities, without citing to any specific affirmative teachings that support his assertions.

Applicants further note for the record that the Examiner has not remarked upon or answered the many meritorious arguments presented by Applicants that describe how the Nakajima reference itself teaches away from the present invention. All of the transmitted signals that the Examiner asserts to be “simultaneous” in the Nakajima reference are never actually described by Nakajima to be simultaneously transmitted. Because the Examiner has not rebutted these arguments, the rejection must still further be withdrawn.

Nevertheless, in the interests of expediting prosecution, Applicants have further amended the independent claims herein to narrow the issues for consideration and broaden the scope of the claims. Specifically, the claims have been amended to recite that the display signals are simultaneously supplied to at least one and at least one subsequent one of the plurality of blocks on the panel. Support for these amendments can be found in at least page 7, lines 6-26, and page 8, lines 7-33 of the present Specification, and the accompanying drawings. Applicants submit that all of the previous arguments (incorporated herein)

regarding Nakajima's failure to teach or suggest simultaneous signal transmission are still applicable to these amended features.

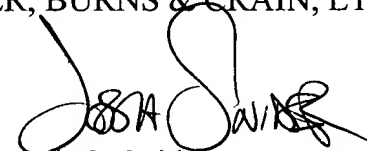
As previously argued, the portions of Nakajima cited by the Examiner teach only the simultaneous *sampling* of the video signals (col. 4, lines 22-23 and 30-31, for example), but not that such signals are also simultaneously transmitted, as featured in the present invention. In fact, Nakajima even teaches away from such features, and the Examiner has not cited to any teachings or suggestions within the reference that dispute this fact. Nakajima expressly teaches that the sampled video signals SIG1-SIG3 are *sequentially* output to the blocks shown in Fig. 1. Fig. 2 of Nakajima unequivocally illustrates that the signal  $V_n$  applied to the block corresponding to element  $HSW_n$  occurs sequentially prior to the signal  $V_{n+1}$  being applied to the subsequent block corresponding to element  $HSW_{n+1}$ . None of the signals applied to the subsequent blocks are ever described or shown to occur simultaneously. Accordingly, Applicants submit that the rejection has been still further overcome for at least these additional reasons.

For all of the foregoing reasons, Applicants submit that this Application, including claims 1-21, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if a further interview would help expedite prosecution.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By

A handwritten signature in black ink, appearing to read "Josh C. Snider", is written over the printed name.

Josh C. Snider

Registration No. 47,954

**Customer No. 24978**

April 24, 2006

300 South Wacker Drive  
Suite 2500  
Chicago, Illinois 60606  
Telephone: (312) 360-0080  
Facsimile: (312) 360-9315  
P:\DOCS\0941\63012\A66049.DOC